

## WILLKIE FARR &amp; GALLAGHER LLP

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March 14, 2025

Via Email ([ALCarterNYSDChambers@nysd.uscourts.gov](mailto:ALCarterNYSDChambers@nysd.uscourts.gov)) and ECF

Honorable Andrew L. Carter Jr.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Rudasill v. Swiss Re American Holding Corporation, et. al.*, Case No. 1:25-cv-01403  
Consent Letter Request for Extension of Time to Respond to Complaint

Dear Judge Carter,

Pursuant to this Court's Individual Practices of Andrew L. Carter, Jr., current as of September 18, 2020, Rule 1.A. and 1.D. and Local Rule 7.1(e), Defendants Great-West Lifeco Inc., Great-West Lifeco U.S. LLC, Empower Annuity Insurance Company of America, Empower Retirement, LLC and Empower Trust Company, LLC (the "Empower Defendants") submit this Consent Letter Request respectfully seeking an extension of time until May 19, 2025 to respond or otherwise plead to the Complaint. In support of this request the Empower Defendants state:

- Willkie Farr & Gallagher LLP was recently retained to represent the Empower Defendants in the above-referenced litigation.
- The first Empower Defendant was served with the Complaint on or about February 25, 2025, making the current responsive pleading due March 18, 2025.
- On March 13, 2025, counsel for Plaintiffs advised counsel for the Empower Defendants that they consented to this request for extension.
- This is the Empower Defendants' first request for an extension of their responsive pleading deadline.
- No initial pretrial conference has been set at this time.

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Therefore, the Empower Defendants respectfully request that the Court grant this Consent Letter Request and extend the deadline for the Empower Defendants to respond to Plaintiffs' Complaint to May 19, 2025. The Empower Defendants reserve all rights, including the right to challenge jurisdiction and other defenses.

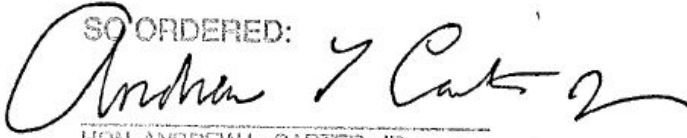
Respectfully Submitted,

/s/Andrew Lichtman

Andrew Lichtman

Attorney for Empower Defendants

Cc: Counsel of record via ECF

SO ORDERED:  
  
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HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

New York, NY  
March 17, 2025